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*Counsel for Lehman Brothers Holdings Inc.
and Certain of Its Affiliates*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re	: Chapter 11 Case No.
	:
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	: 08-13555 (SCC)
	:
Debtors.	: (Jointly Administered)
-----X	

**CERTIFICATE OF NO OBJECTION
UNDER 28 U.S.C. § 1746 REGARDING OMNIBUS CLAIMS
OBJECTION SCHEDULED FOR HEARING ON DECEMBER 17, 2015**

TO THE HONORABLE SHELLEY C. CHAPMAN
UNITED STATES BANKRUPTCY JUDGE:

Pursuant to 28 U.S.C. § 1746, and in accordance with this Court's case management procedures set forth in the *Second Amended Order Pursuant to Section 105(a) of the Bankruptcy Code and Bankruptcy Rules 1015(c) and 9007 Implementing Certain Notice and Case Management Procedures*, entered on June 17, 2010 [ECF No. 9635] (the "Second Amended Case Management Order"), the undersigned hereby certifies as follows:

1. Lehman Brothers Holdings Inc. ("LBHI"), as Plan Administrator pursuant to the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors for the entities in the above-referenced chapter 11 cases, filed the *Five*

Hundred Eleventh Omnibus Objection to Claims (Subordinated Guarantee Claims) [ECF No. 51423] (the “Claims Objection”) on November 9, 2015.

2. In accordance with the Second Amended Case Management Order, LBHI established a deadline of December 9, 2015 at 4:00 p.m. (Eastern Time) (the “Response Deadline”) for parties to object or file responses to the Claims Objection.

3. The Second Amended Case Management Order provides that pleadings may be granted without a hearing, provided that no objections or other responsive pleadings have been filed on or prior to the relevant response deadline and the attorney for the entity who filed the pleading complies with the relevant procedural and notice requirements.

4. The Response Deadline has now passed and, to the best of my knowledge, no responsive pleadings to the Claims Objection have been (a) filed with the Court on the docket of the above-referenced cases in accordance with the procedures set forth in the Second Amended Case Management Order or (b) served on LBHI’s counsel by the holders of the claims included in the Claims Objection.

5. Accordingly, LBHI respectfully requests that the proposed order granting the Claims Objection annexed hereto as Exhibit A be entered in accordance with the procedures described in the Second Amended Case Management Order. Except for minor revisions to clarify that the claims listed on Exhibit 1 annexed to the proposed order shall be classified as allowed claims in LBHI Class 12 under the Plan¹ in the respective amounts shown on Exhibit 1, the proposed order is unmodified since the filing of the Claims Objection.

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Five Hundred Eleventh Omnibus Objection to Claims.

I declare that the foregoing is true and correct.

Dated: December 11, 2015
New York, New York

**CURTIS, MALLET-PREVOST,
COLT & MOSLE LLP**

By: /s/ L. P. Harrison 3rd
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and Certain of Its Affiliates*

EXHIBIT A

(Proposed Order)

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

-----X
In re : **Chapter 11 Case No.**
: **LEHMAN BROTHERS HOLDINGS INC., et al.,** : **08-13555 (SCC)**
: **Debtors.** : **(Jointly Administered)**
-----X

**ORDER GRANTING FIVE HUNDRED ELEVENTH
OMNIBUS OBJECTION TO CLAIMS (SUBORDINATED GUARANTEE CLAIMS)**

Upon the five hundred eleventh omnibus objection to claims, dated November 9, 2015 (the “Five Hundred Eleventh Omnibus Objection to Claims”),¹ of Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and its Affiliated Debtors, pursuant to sections 502(b) and 510(a) of title 11 of the United States Code, Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court’s order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664], seeking to classify the Subordinated Guarantee Claims, all as more fully described in the Five Hundred Eleventh Omnibus Objection to Claims; and due and proper notice of the Five Hundred Eleventh Omnibus Objection to Claims having been provided, and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the Five Hundred Eleventh Omnibus Objection to Claims is in the best interests of the Chapter 11 Estates, their creditors, and all parties in interest, and that the legal and factual bases set forth in the Five Hundred Eleventh Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor, it is

¹ Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Five Hundred Eleventh Omnibus Objection to Claims.

ORDERED that the relief requested in the Five Hundred Eleventh Omnibus
Objection to Claims is granted; and it is further

ORDERED that all portions of the claims listed on Exhibit 1 annexed hereto that
relate to the securities identified by ISIN XS0282978666 or ISIN XS0301813522 or the
guarantees issued by LBHI in connection therewith, whether liquidated, unliquidated or
undetermined, shall be classified as allowed claims in LBHI Class 12 under the Plan in the
respective amounts shown on Exhibit 1; and it is further

ORDERED that the Court-appointed claims agent is authorized to modify the
claims register to reflect this Order; and it is further

ORDERED that this Court shall retain jurisdiction to hear and determine all
matters arising from or related to this Order.

Dated: _____, 2015
New York, New York

UNITED STATES BANKRUPTCY JUDGE

OMNIBUS OBJECTION 511: EXHIBIT A - SUBORDINATED GUARANTEE CLAIMS

	NAME	CASE NUMBER	DEBTOR NAME	FILED DATE	CLAIM #	ISIN*	AMOUNTS TO BE DISALLOWED
1	J.P. MORGAN SUISSE SA	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/30/09	59849	XS0301813522	\$ 101,936.00
2	J.P.MORGAN SECURITIES LTD	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/27/09	49681	XS0301813522	\$ 1,009,734.00
3	J.P.MORGAN SECURITIES LTD	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/27/09	49783	XS0282978666	\$ 1,615,034.59
4	JP MORGAN INTERNATIONAL BANK LIMITED	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/30/09	59848	XS0301813522	\$ 841,445.00
5	MANUEL COELHO AFFONSO DE BARROS, ANTONIO	08-13555 (SCC)	Lehman Brothers Holdings Inc.	10/27/09	49837	XS0282978666	\$ 44,754.00
						TOTAL	\$ 3,612,903.59

* Only those portions of the claim related to the ISINs listed are subject to the Plan Administrators' Five Hundred Eleventh Omnibus Objection.